

**BEFORE THE UNITED STATES
JUDICIAL PANEL ON MULTIDISTRICT LITIGATION**

In re: Route 91 Harvest Festival Shootings

: MDL NO. _____

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: _____

U.S. DISTRICT COURT

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**MGM'S MOTION TO TRANSFER AND CENTRALIZE
PURSUANT TO 28 U.S.C. § 1407**

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RESORT GROUP, MGM RESORTS
VENUE MANAGEMENT, LLC, and
MGM RESORTS FESTIVAL GROUNDS LLC

MGM Resorts International, Mandalay Bay, LLC, Mandalay Resort Group, MGM Resorts Venue Management, LLC and MGM Resorts Festival Grounds, LLC (together, "MGM") respectfully move the United States Judicial Panel on Multidistrict Litigation for an order transferring all Actions arising out of the Route 91 Harvest Festival shooting on October 1, 2017, set forth in the attached Schedule of Actions, to a single district court for coordinated pretrial proceedings pursuant to 28 U.S.C. § 1407.

The Panel should enter this order for the following reasons, which are fully set forth in the accompanying memorandum:

1. These Actions present common questions of fact relating to who bears responsibility for a gunman's murderous rampage;
2. Transfer to a single district court for coordinated proceedings will serve the convenience of the parties and witnesses by preventing duplicative discovery and motion practice and inconsistent rulings by different courts;
3. Transfer to a single district court for coordinated proceedings will promote the just and efficient conduct of this litigation by eliminating the need to litigate identical factual and legal issues across numerous cases, thereby conserving the resources of the parties and the judiciary;
4. MGM takes no position on where these Actions should be transferred but, in the interest of providing the Panel with full information, notes that the Central District of California, where the vast majority of Plaintiffs, Defendants, and counsel reside, has the plurality of the Actions filed to date. Two Actions are pending in the District of Nevada, where the incident occurred and where MGM resides. Other declaratory relief actions are pending in the District of Alaska,

District of Arizona, Southern District of Florida, Southern District of New York,
Southern District of Texas, and District of Utah.

WHEREFORE, MGM respectfully asks the Panel to issue an order transferring all Actions arising out of the Route 91 Harvest Festival shooting on October 1, 2017 to a single district court for coordinated pretrial proceedings pursuant to 28 U.S.C. § 1407.

DATED: July 19, 2018

Respectfully Submitted,

/s/ Bethany W. Kristovich
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